

## Cestone, Paul

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**From:** Cestone, Paul  
**Sent:** Friday, August 2, 2019 12:57 PM  
**To:** Shannon, Julie; Richmond, Jonah; Sherlock, Scott  
**Cc:** Cestone, Paul  
**Subject:** Done. All have been reviewed at least twice by both myself and Julie...

... and there are zero documents or messages that are responsive. No documents refer to PCBs. Any and all documents here reference Monsanto's Roundup or its chemical constituents or the WHO, or international programs, with some meeting schedules and some documents noted as CBI.

I subsequently went to the document list and scanned the two FOIA Responsiveness and FOIA Disposition columns, and all documents are noted as Not Responsive and Withhold in Entirety with no other notations.

However, let Julie confirm the NPCD review is complete. She has stepped away from her desk at this moment.

Please advise on what our next step should be on this FOIA. We will need to communicate to the requester that we have no documents that are responsive.

Paul

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**From:** Shannon, Julie <Shannon.Julie@EPA.GOV>  
**Sent:** Friday, August 02, 2019 11:53 AM  
**To:** Cestone, Paul <Cestone.Paul@epa.gov>; Richmond, Jonah <Richmond.Jonah@epa.gov>  
**Subject:** RE: I'm at 725. Julie has reviewed the first 400. Depending on Julie's schedule the coding could be finished by mid afternoon to COB.

I've caught up to you, Paul.

Jonah – I have not seen a single reference to PCBs which is the requester's interest. The documents/emails with Monsanto are about pesticides, pollinators, glyphosate, etc.

Julie

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**From:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Sent:** Friday, August 02, 2019 11:39 AM  
**To:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Cc:** Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** I'm at 725. Julie has reviewed the first 400. Depending on Julie's schedule the coding could be finished by mid afternoon to COB.

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**From:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Sent:** Friday, August 02, 2019 11:36 AM  
**To:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Cc:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** RE: 400 documents have been re-labeled. Hope to be finished tomorrow.

Great. Thank you so much Paul.

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**Jonah Richmond**

Regulatory and Information Coordination Staff  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-0210

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**From:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Sent:** Thursday, August 01, 2019 4:55 PM  
**To:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Cc:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>; Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Subject:** 400 documents have been re-labeled. Hope to be finished tomorrow.

Jonah,

I just went through the first 400 of the 949 documents. ALL are not responsive. None deal with PCBs. I am quite sure the remaining will be the same. Having gone through them before I don't remember any that specifically reference PCBs. Many, perhaps almost all documents have duplicates or even more repeats.

So, I will continue to re code the documents as non-responsive/withhold in entirety as they may indicate and I should be finished tomorrow. Julie Shannon indicated she'd give another secondary review and the review should go fairly quickly as I doubt she'll find any discrepancies. I'll then let you know, Jonah, when we complete the review and you can give your seal of approval.

Scott, please let me know when you are available as I think it would be appropriate that you participate in any further calls to DesRoches to notify him of the results.

Paul

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**From:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Sent:** Thursday, August 01, 2019 2:29 PM  
**To:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>; Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>  
**Cc:** Latham, John <[Latham.John@epa.gov](mailto:Latham.John@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** RE: 949 documents have been reviewed by me and PAOB/NPCD supervisor Julie Shannon and are ready for release. Please let me know if the documents require more vetting before release.

Thanks Paul. Yes, we should not release documents that are not responsive. Please remark as not responsive, and if there are any that are still responsive after your review, let me know and I'd be happy to take a quick look at them.

If there are no responsive documents, that is what we must communicate to the requester. We can explain exactly where and how we searched for records.

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**Jonah Richmond**

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**From:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Sent:** Thursday, August 01, 2019 2:14 PM  
**To:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>; Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>  
**Cc:** Latham, John <[Latham.John@epa.gov](mailto:Latham.John@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** RE: 949 documents have been reviewed by me and PAOB/NPCD supervisor Julie Shannon and are ready for release. Please let me know if the documents require more vetting before release.

Jonah,

We recognized that most, if not all of these documents were technically off topic and thus unresponsive. As such, rather than burden your staff to make changes I can go back in and change the statuses to “not responsive, withhold in entirety.”

However, and this is directed to Scott, after all this time we will have nothing to provide Mr. DesRosches, a result he will not be pleased with. There really is nothing more that we in NPCD can do. We can't scare up documents or communications that don't exist.

Anyway, let me know if you want me to remark the documents Jonah, and Scott, you can let me know how you want to communicate the results to DesRoches.

Paul

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**From:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Sent:** Thursday, August 01, 2019 1:55 PM  
**To:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>; Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Cc:** Latham, John <[Latham.John@epa.gov](mailto:Latham.John@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** RE: 949 documents have been reviewed by me and PAOB/NPCD supervisor Julie Shannon and are ready for release. Please let me know if the documents require more vetting before release.

Before contacting OPP, I took a look at the original FOIA request, and they are requesting records about PCBs. None of the records I looked at were on that topic. Therefore, rather than contacting OPP, I think what makes the most sense is to go through the records again and mark all of the ones that are non-responsive, and then at that point identify whether there is anything that needs to be reviewed either by management or by OPP. I could have one of my document reviewers do this, but it would probably not be done by this week. Does that sound like a good plan?

Let me know if this doesn't make sense or if I'm misunderstanding something.

Thanks again,  
Jonah

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**Jonah Richmond**  
Regulatory and Information Coordination Staff  
Office of Chemical Safety and Pollution Prevention  
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**From:** Richmond, Jonah  
**Sent:** Thursday, August 01, 2019 1:25 PM

**To:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>; Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Cc:** Latham, John <[Latham.John@epa.gov](mailto:Latham.John@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** RE: 949 documents have been reviewed by me and PAOB/NPCD supervisor Julie Shannon and are ready for release. Please let me know if the documents require more vetting before release.

I just left a message with Paul. Glancing at just the first 50 documents, I'm seeing a lot of deliberative information that should be redacted. These are also primarily communications between OPP leadership and the IO, so I want to check in with OPP. It's possible that these records have already been released for a different request, in which case we would want to make sure the redactions are consistent, or refer the requester to already released records.

I will circle back after checking in with OPP.

Thanks everyone,  
Jonah

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**Jonah Richmond**  
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**From:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>  
**Sent:** Thursday, August 01, 2019 12:21 PM  
**To:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>; Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Cc:** Latham, John <[Latham.John@epa.gov](mailto:Latham.John@epa.gov)>; Shannon, Julie <[Shannon.Julie@EPA.GOV](mailto:Shannon.Julie@EPA.GOV)>  
**Subject:** RE: 949 documents have been reviewed by me and PAOB/NPCD supervisor Julie Shannon and are ready for release. Please let me know if the documents require more vetting before release.

Is there any necessary "management" review that needs to occur before we release these docs?

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**From:** Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Sent:** Thursday, August 01, 2019 11:11 AM  
**To:** Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>  
**Cc:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>; Cestone, Paul <[Cestone.Paul@epa.gov](mailto:Cestone.Paul@epa.gov)>  
**Subject:** 949 documents have been reviewed by me and PAOB/NPCD supervisor Julie Shannon and are ready for release. Please let me know if the documents require more vetting before release.

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Paul Cestone 202-566-0489